

Granted.
Denise L. Cote
12/16/22

UNITED STATE DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK

ZOETIS, INC.,

Plaintiff,

v.

BOEHRINGER INGELHEIM VETMEDICA,
GmbH, a German Corporation,

Defendant.

Civ. Action No.: 1:21-cv-08319

Hon. Denise L. Cote

**PLAINTIFF'S SUBMISSION OF REDACTED
SUMMARY JUDGMENT MATERIALS**

Pursuant to the Court's December 9, 2022 Order (ECF 66), Plaintiff Zoetis, Inc. ("Zoetis") respectfully submits public, redacted versions of its summary judgment materials, attached hereto.

Zoetis's opening brief and Exhibit 1 (both filed at ECF 49) are submitted herewith with limited redactions that are justified because they relate to specifically negotiated terms of the license agreement at issue between the parties, the terms of which are confidential between the parties and reflect competitively sensitive licensing information. Moreover, the redactions relate to specific licensing terms that are not disputed in the present case, and therefore do not form the basis of the parties' arguments or the Court's Opinion.

Also attached are versions of Exhibits 6-9, 11-22, and 32 with limited redactions. Each of these exhibits contains personally identifiable information of the parties' employees (such as phone numbers and email addresses) that are not relevant to the present dispute and should not be publicly disclosed. Exhibits 11-22 and 32 also contain information regarding the licensing terms as described in the prior paragraph.

Finally, Zoetis also attaches copies of its Local Rule 56.1 statement (ECF 51), its reply brief (ECF 63), and its counter-statement to Defendant's Local Rule 56.2 statement (ECF 65), all in unredacted form.

Dated: December 15, 2022

Respectfully submitted,

/s/ Philip L. Hirschhorn

Philip L. Hirschhorn

Keith A. Jones

PANITCH SCHWARZE BELISARIO & NADEL LLP

Two Commerce Square

2001 Market Street, Suite 2800

Philadelphia, PA 19103-7044

Tel: (215) 965-1330

Fax: (215) 965-1331

phirschhorn@panitchlaw.com

kjones@panitchlaw.com

Counsel for Plaintiff Zoetis, Inc.